

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

D.V.D.; M.M.; E.F.D.; and O.C.G.,

Plaintiffs,

v.

U.S. DEPARTMENT OF HOMELAND SECURITY;
Kristi NOEM, Secretary, U.S. Department of
Homeland Security, in her official capacity; Pamela
BONDI, U.S. Attorney General, in her official
capacity; and Antone MONIZ, Superintendent,
Plymouth County Correctional Facility, in his official
capacity,

Defendants.

Civil Action No. 25-cv-10676-BEM

AUTHENTICATING DECLARATION OF GLENDA M. ALDANA MADRID

I, Glenda M. Aldana Madrid, declare under penalty of perjury that the statements that follow are true and correct to the best of my knowledge and belief:

1. I am a staff attorney at the Northwest Immigrant Rights Project. I am one of the counsel for Plaintiffs and class members in the above-captioned case. I submit this declaration in support of Plaintiffs' Emergency Motion for a Temporary Restraining Order on behalf of class members removed to South Sudan.
2. I have personal knowledge of the facts set forth herein, and, if called as a witness, I could and would testify completely as set forth below.
3. Enclosed as Exhibit A is a true and correct copy of an email I received from class member T.T.P.'s partner seeking help regarding T.T.P.'s removal to a third country.

Executed this 20th day of May 2025, in Seattle, Washington.

s/ Glenda M. Aldana Madrid
Glenda M. Aldana Madrid

EXHIBIT A



Glenda Aldana Madrid <glenda@nwirp.org>

T [REDACTED] T [REDACTED] P [REDACTED] - Removal to Third Country

1 message

T [REDACTED] K [REDACTED] @gmail.com>
To: glenda@nwirp.com

Tue, May 20, 2025 at 11:52 AM

Hi Glenda,

I believe my husband, T [REDACTED] T [REDACTED] P [REDACTED], and 10 other individuals that were sent to the Port Isabel Detention Center in Los Fresnos, TX were deported to South Africa or Sudan early this morning. Yesterday ICE gathered them together and told them that they (ICE) intended to send them all to South Africa and everyone refused to sign the document presented. Later, ICE came back and said they were going to send them to Sudan instead. I checked the ICE detainee locator and my husband and another person from his group are no longer in the system. I called my husband's ICE officer and was told that he's been "booked out" but the officer didn't know where he was sent.

The order of removal signed by a judge is to deport my husband back to his country of origin, Vietnam, not to any other third country. The detention centers are overcrowded with inhumane conditions, and ICE is sending people anywhere they can to combat the overcrowding. This is not right! I fear that my husband and his group, which consist of people from Laos, Thailand, Pakistan, Korea, and Mexico are being sent to South Africa or Sudan against their will. Please help! They cannot be allowed to do this, this is not the first and won't be the last if they keep getting away with it! I am begging for your assistance.. 😢😢

N [REDACTED]